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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: EFFEXOR XR ANTITRUST
LITIGATION**

THIS DOCUMENT RELATES TO:

All Direct Purchaser Class Actions

**Master Docket No. 3:11-cv-05479
(ZNQ/JBD)**

**NOTICE OF DIRECT PURCHASER CLASS PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

PLEASE TAKE NOTICE that on January 13-14, 2026, the undersigned counsel for Direct Purchaser Class Plaintiffs Rochester Drug Co-Operative, Inc., Stephen L. LaFrance Holdings, Inc. d/b/a SAJ Distributors, and Uniondale Chemists, Inc. (“Plaintiffs” or “DPPs”) will move before the Hon. Zahid N. Quraishi, U.S.D.J., pursuant to the Federal Rules of Civil Procedure for an order:

1. Certifying the following class (the “Class” or “Direct Purchaser Class”) pursuant to Fed. R. Civ. P. 23(b)(3):

All persons or entities in the United States and its territories who purchased Effexor XR and/or AB-rated generic versions of Effexor XR directly from Wyeth or Teva¹ at any time during the period June 14, 2008 through and until May 31, 2011 (the “Class Period”).

Excluded from the Direct Purchaser Class are Wyeth and Teva and their officers, directors, management, employees, subsidiaries, or affiliates, all governmental entities, and all persons or entities that purchased Effexor XR directly from Wyeth during the Class Period that did not also purchase generic Effexor XR directly.

2. Appointing Rochester Drug Co-Operative, Inc., Stephen L. LaFrance Holdings, Inc. d/b/a SAJ Distributors, and Uniondale Chemists, Inc. as the representatives of the Class.
3. Confirming the appointment of Hagens Berman Sobol Shapiro LLP; Berger Montague PC; Faruqi & Faruqi LLP; Taus, Cebulash & Landau LLP; Nastlaw LLC; and Barrett Law Group, P.A. as Co-Lead Counsel for the Class, and Cohn Lifland Pearlman Herrmann & Knopf LLP as Liaison Counsel for the Class. *See* ECF 85, ¶ 1 (appointing these firms as the interim class counsel executive committee and liaison counsel for the proposed class).

¹ “Wyeth” means Wyeth LLC, Wyeth Pharmaceuticals, Inc., Wyeth-Whitehall Pharmaceuticals LLC, and Wyeth Pharmaceuticals Company, collectively or individually. “Teva” means Teva Pharmaceuticals USA, Inc. and Teva Pharmaceutical Industries Ltd., collectively or individually.

In support of the motion, DPPs hereby incorporate and rely upon the accompanying memorandum, exhibits, and proposed trial plan, as well as all other briefing or materials submitted in connection with this motion, and any argument made in connection with this motion. DPPs also submit a Proposed Order herewith.

Dated: May 22, 2025

Respectfully submitted,

/s/ Matthew F. Gately

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Interim Executive Committee for the Direct Purchaser Class Plaintiffs